

United States Government

Department of Energy

memorandum

DATE: December 1, 2000

REPLY TO

ATTN OF: Office of Environmental Policy and Guidance:Woodbury:6-4371

SUBJECT:

Notice of Availability and Request for Comment – Draft Update IVB “EPA Publication SW-846 - Test Methods for Evaluating Solid Waste, Physical/Chemical Methods”

TO:

Distribution

On November 27, 2000, the Environmental Protection Agency (EPA) published a notice in the *Federal Register* (65 FR 70678) requesting comment on the proposed revision to the Third Edition of the EPA-approved test methods manual *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*, EPA Publication SW-846. This revision to SW-846 has been designated Update IVB. The purpose of this memorandum is to notify DOE elements of the availability of Update IVB and to request comments on this proposed update.

Update IVB proposes revisions to Chapters Two, Three, Four, Five, Six, and Ten. It includes fifteen revised SW-846 methods, and twelve new SW-846 methods. These are listed in Table 1 and Table 2 of the aforementioned *Federal Register* Notice. A number of revised methods proposed in Draft Update IVA (dated January 1998) have been further revised, and are being released again as part of Draft Update IVB versions. EPA requests comments on all the revisions listed in Table 1 and Table 2.

Two new test methods for determining ignitability of waste streams may be of particular interest to DOE.

Method 1040 – Test Method for Oxidizing Solids

Method 1050 – Test Methods to Determine Substances Likely to Spontaneously Combust

While EPA does not propose these methods as mandatory for determining if wastes meet the RCRA ignitability characteristic, EPA does indicate that “this method may be used to meet certain regulatory applications, but it is not required for determining if a waste passes or fails the characteristic of ignitability per the RCRA definition”. (Before this there was no test method for determining ignitability of solids - only a prose description of what constituted an ignitable waste.) Even though EPA has not proposed use of the method for determining ignitability, they could do so in the future. Or state regulators could begin to require these methods as part of RCRA permits.

The Office of Environmental Policy and Guidance (EH-41) will consolidate DOE comments on this proposed update. EH-413 requests comments from interested DOE elements by **January 26, 2001**. All comments received by this date will be considered for inclusion in the preparation of the consolidated DOE response to EPA. Comments received after this date will be forwarded to EPA after the close of the comment period if new and significant issues are identified. Please reference specific sections of the update

when preparing comments to facilitate consolidation of similar comments. Comments may be faxed to Steven Woodbury of my staff at (202) 586-0955. In order to expedite the preparation of the comment package, we are requesting that comments also be sent via electronic mail to steven.woodbury@eh.doe.gov.

Update IVB to SW-846 is available for viewing/downloading from the Internet at <http://www.epa.gov/SW-846>. The Federal Register Notice is accessible at <http://www.epa.gov/fedrgstr/EPA-WASTE/2000/November/Day-27/f30111.htm>, and lists sources for paper copies of the Third Edition of SW-846 and all of its updates. If you have any questions on the memorandum in particular, or hazardous waste testing issues in general, please contact Mr. Woodbury at (202) 586-4371.

A handwritten signature in black ink, appearing to read 'T. Traceski', with a stylized flourish at the end.

Thomas T. Traceski
Director, RCRA/CERCLA Division
Office of Environmental Policy and Guidance